

**BEFORE
THE PUBLIC SERVICE COMMISSION OF
SOUTH CAROLINA**

DOCKET NO. 2003-327-C

IN RE:

Continued Availability of Unbundled)	ITC^DELTACom
High Capacity Loops at Certain Locations and)	COMMUNICATIONS, INC.'S
Unbundled High Capacity Transport on Certain)	OBJECTIONS TO BELLSouth'S
Routes Pursuant to the Federal Communication)	FIRST SET OF
Commission's Triennial Review Order)	INTERROGATORIES (14-27)
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Pursuant to S.C. Code Ann. Regs. 103-854, S. C. Rule of Civil Procedure 34, and the Joint Motion for Initial Procedural Order approved on December 11, 2003, ITC^DeltaCom Communications, Inc. ("ITC^DeltaCom") hereby submits its specific objections to BellSouth Telecommunications, Inc.'s ("BellSouth") First Set of Interrogatories served on December 8, 2003.

INTERROGATORIES

14. Provide a list of all BellSouth wire centers in the Southeastern states to which you are currently in the process of deploying, or plan to deploy transport facilities and/or loop facilities. List wire centers if this deployment is in process or will take place from the time period beginning October 1, 2003 through December 31, 2004.

RESPONSE:

ITC^DeltaCom objects on the grounds that the information sought is irrelevant to the issues in this docket and not reasonably calculated to lead to the discovery of admissible evidence. At paragraphs 335 and 410, the TRO establishes factors that the Commission should consider in any analysis of a loop and transport potential deployment case. The information sought by BellSouth is beyond the scope of the factors established by the FCC. In addition, the information sought by this interrogatory is highly proprietary and confidential, and the disclosure of this information could be damaging to ITC^DeltaCom's business.

15. List all BellSouth wire centers in the Southeastern states where you have collocation, either virtual or physical. In Microsoft Excel format, list the 11-character wire center CLLI code and the CLLI code designating each arrangement you have within that wire center. For each wire center listed identify:

- a. The type of collocation (caged, cageless, shared, virtual, other (with a description)) and identify the total amount of space currently occupied and reserved for future growth;
- b. The type of equipment and number of equivalent DS0 channels for all services in the collocation space (e.g., DLC, remote switches, multiplexers, transmission terminals, etc.).
- c. The transmission facilities and number of equivalent DS0 channels for all services used to connect the office to your switch or non-ILEC switching provider (e.g., BellSouth UNEs, BellSouth special access, self provision, third party provision).
- d. The amount of unused or excess space in each collocation space.
- e. The number of active and inactive DS1 cross connects
- f. The number of active and inactive DS3 Cross-connects
- g. The number of active and inactive 2-fiber cross-connects
- h. The number of active and inactive 4-fiber cross-connects.
- i. State whether you have deployed fiber "entrance" facilities that you own which connect to the collocation arrangements identified.
- j. State whether you have fiber "entrance" facilities that you have obtained from a person other than BellSouth which connect to the collocation arrangements identified.
- k. State whether you have fiber cross-connects which connect the identified arrangement(s) to other persons collocated at the same wire center. If yes, (i) identify all carriers to which your arrangements are connected within the wire center; and (ii) identify the capacity or type of connection.

RESPONSE:

ITC^DeltaCom objects on the grounds that, to the extent ITC^DeltaCom's collocations are in BellSouth central offices, BellSouth has all the information it seeks here and to require ITC^DeltaCom to reproduce what BellSouth already has in its possession would be onerous, unreasonable and unduly burdensome. Carriers collocating in BellSouth's central offices must complete detailed application forms for submission to BellSouth including detailed information on the type of collocation requested, the equipment to be installed in the collocation space and the number and type of cross-connects required. BellSouth bills all collocators monthly recurring charges for the use

of collocation space and for cross-connects. The collocation application also includes information on the number of DS0 equivalents. ITC^DeltaCom also objects to interrogatory No. 15 on the grounds it is oppressive and unduly burdensome and seeks proprietary and confidential business information. ITC^DeltaCom further objects to subparts "i" and "j" because entrance facilities have been delisted by the TRO and are not included within the definition of "transport" as redefined in the TRO.

16. Provide a list of all BellSouth wire centers and/or central offices in the Southeastern states to which you have deployed high capacity transport facilities that are operationally ready to provide dedicated transport along a route, directly, or indirectly through a location not affiliated with BellSouth, to one other BellSouth central office. The facilities must terminate to an active collocation arrangement. This interrogatory varies from Interrogatory No. 1 in this docket as it seeks wire centers/central offices even if you are not actually providing transport from the locations; it also seeks wire centers/central offices that your facilities route through directly or indirectly. For example, in answering this Interrogatory, provide information about facilities that may indirectly provide transport along a route, for example, using the diagram below, the IXC transport route should be identified:

BST wire center → IXC POP ↔ IXC POP → BST wire center

For each central office or wire center that you list, identify:

- a. The CLLI code of the central office.
- b. The type of collocation at which the facilities terminate;
- c. The customer name of record for the collocation arrangement and the 11-character CLLI code for the collocation arrangement;
- d. Indicate whether the facilities are provided over dark fiber you have obtained from BellSouth;
- e. The total active capacity and number of fiber strands deployed as of the most recent date available;
- f. Whether you are able and able immediately to provide DS1 transport, on a wholesale basis, over the transport facilities;
- g. Whether you are willing and able immediately to provide DS3 transport, on a wholesale basis, over the transport facilities;
- h. Whether you are willing and able immediately to provide dark fiber transport, on a wholesale basis, over the transport facilities.

For each central office or wire center that you list, identify:

- a. The CLLI code of the central office.
- b. The type of collocation at which the facilities terminate:

- c. The customer name of record for the collocation arrangement and the 11-character CLLI code for the collocation arrangement.
- d. The total active capacity and number of fiber strands deployed as of the most recent date available;
- e. The type of facility (e.g., fiber, coaxial cable, etc.).

RESPONSE:

ITC^DeltaCom objects on the grounds that, to the extent ITC^DeltaCom's collocations are in BellSouth central offices. The information is already available to BellSouth and to require ITC^DeltaCom to reproduce it would be onerous, unreasonable and unduly burdensome. ITC^DeltaCom objects on the grounds that the information sought is irrelevant and not reasonably calculated to lead to the discovery of admissible evidence. The FCC expressly rejected adoption of an impairment test based on each link between two incumbent local exchange carrier offices (so called "daisy chaining") at paragraph 402 of the TRO.

17. For each central office/wire center identified in response to Interrogatory No. 16:

- a. Are your transport facilities operationally ready to provide dedicated transport between the central office/wire center identified and any other ILEC wire center on the same list?
- b. If your responses to part (a) above is negative, identify each such the ILEC central offices on the list that does not satisfy part (a) and explain with particularity why not.

RESPONSE:

ITC^DeltaCom objects on the grounds stated in its objections to Interrogatory 16.

18. Provide a list of all BellSouth wire centers and/or central offices in the Southeastern states from which you offer to other carriers on a wholesale basis DS1 or higher transport facilities, or dark fiber transport facilities that provide a route, directly, or indirectly through a location not affiliated with BellSouth, to one other BellSouth central office. The facilities must terminate to an active collocation arrangement. This interrogatory varies from Interrogatory No.2 in this docket as it seeks wire centers/central offices that your facilities route through directly or indirectly. For example, in answering this Interrogatory, provide information about facilities that may indirectly provide transport along a route, for example, using the diagram below, the transport route between IXC – points of presence (“POP”) should be identified:

BST wire center→IXC POP←→IXC POP→BST wire center

For each central office or wire center that you list, identify:

- a. The CLLI code of the central office.
- b. The type of collocation at which the facilities terminate;
- c. The customer name of record for the collocation arrangement and the 11-character CLLI code for the collocation arrangement;
- d. Indicate whether the facilities are provided over dark fiber you have obtained from BellSouth;
- e. The total active capacity and number of fiber strands deployed as of the most recent date available;
- f. Whether you are able and able immediately to provide DS1 transport, on a wholesale basis, over the transport facilities;
- g. Whether you are willing and able immediately to provide DS3 transport, on a wholesale basis, over the transport facilities;
- h. Whether you are willing and able immediately to provide dark fiber transport, on a wholesale basis, over the transport facilities.

RESPONSE:

ITC^DeltaCom objects on the grounds stated in its objections to Interrogatory 16.

19. For each central office/wire center identified in response to Interrogatory No. 18:

- a. Are you willing and able immediately to provide high capacity transport, on a wholesale basis, over transport facilities between the wire central office/wire center identified and any other ILEC wire center on the same list?
- b. If your responses to part (a) above is negative, identify each such the ILEC central office/wire center on the list that does not satisfy part (a) and explain with particularity why not.

RESPONSE:

ITC^DeltaCom objects on the grounds stated in its objections to Interrogatory 16.

20. Identify the points within all Southeastern states at which you connect your local network facilities to the networks of other carriers, including but not limited to interconnection with other CLECs, interexchange carriers, internet service providers at any point of presence ("POP"), network access point ("NAP"), collocation hotels, data centers, or similar facility. This interrogatory may be answered with network diagrams.

RESPONSE:

ITC^DeltaCom objects on the grounds that the information requested is irrelevant, not reasonably calculated to lead to discovery of admissible evidence, is unduly burdensome, and seeks proprietary and confidential business information. The TRO redefined transport so as to limit it to transmission facilities between incumbent local exchange carrier switches or wire centers. The points at which ITC^DeltaCom connects to the networks of carriers and firms other than BellSouth is irrelevant to whether ITC^DeltaCom could potentially deploy a high capacity loop from its network to a specific customer location or provide high capacity transport. Interrogatory 19 seeks information which is beyond the scope of the TRO and, thus, irrelevant to this proceeding. The FCC expressly rejected adoption of an impairment test based on each link between two incumbent local exchange carrier offices (so called "daisy chaining") at paragraph 402 of the TRO.

21. Identify the points within all Southeastern states at which you connect your local network facilities to BellSouth's network, including but not limited to any and all points of presence ("POP"). This interrogatory may be answered with network diagrams.

RESPONSE:

ITC^DeltaCom objects on the grounds that, as applied to ITC^DeltaCom, the information requested is irrelevant, not reasonably calculated to lead to discovery of admissible evidence, is unduly burdensome, and seeks proprietary and confidential business information. The TRO redefined transport so as to limit it to transmission facilities between incumbent local exchange carrier switches or wire centers. Interrogatory 19 seeks information which is beyond the scope of the TRO and, thus, irrelevant to this proceeding. The FCC expressly rejected adoption of an impairment test based on each link between two incumbent local exchange carrier offices (so called "daisy chaining") at paragraph 402 of the TRO. ITC^DeltaCom objects on the grounds that BellSouth is in possession of the information sought regarding connections to its network.

22. On an MSA-specific basis, in the southern states please describe with specificity the configuration of your transport and/or loop facilities; including, but not limited to: (a) the configuration of your facilities (e.g., point to point or ring configuration); (b) the customer specific locations that are accessible from your facilities; and (c) a list of all customer units accessible in a multi-tenant building.

RESPONSE:

ITC^DeltaCom objects on the grounds that the information requested is irrelevant, not reasonably calculated to lead to discovery of admissible evidence, is unduly burdensome, and seeks proprietary and confidential business information. Information on the configuration of ITC^DeltaCom's transport or loop facilities is irrelevant to this proceeding. The FCC expressly rejected adoption of an impairment test based on each link between two incumbent local exchange carrier offices (so called "daisy chaining") at paragraph 402 of the TRO.

23. Provide a list of all fiber rings in the Southeastern states you own or control and identify the location (by street address) of each add-drop multiplexer or comparable facility for connection other transport facilities (e.g., wire centers, loops, other fiber rings) to the fiber ring.

RESPONSE:

ITC^DeltaCom objects on the grounds that the information requested is irrelevant, not reasonably calculated to lead to discovery of admissible evidence, is unduly burdensome, and seeks proprietary and confidential business information. In paragraphs 335 and 410 of the TRO, the FCC establishes the factors to be considered in a potential deployment case. The information sought by BellSouth is beyond the scope of these factors. The FCC expressly rejected adoption of an impairment test based on each link between two incumbent local exchange carrier offices (so called "daisy chaining") at paragraph 402 of the TRO.

24. Identify each shared or non-BellSouth location (e.g., collocation hotel) in the Southeastern states in which you are located. For each such location state:

- a. The type of collocation or sharing/leasing of space for placement of equipment (e.g., caged, cageless, shared, or virtual);
- b. The type of equipment and number of equivalent DS0 channels for all services in the collocation space (e.g., DLC, remote switches, multiplexers, transmission terminals, etc.).
- c. The transmission facilities and number of equivalent DS0 channels for all services used to connect the office to your switch or non-ILEC switching provider (e.g., BellSouth UNEs, BellSouth special access, self provision, third party provision).

RESPONSE:

ITC^DeltaCom objects on the grounds that the information requested is irrelevant, not reasonably calculated to lead to discovery of admissible evidence, is unduly burdensome, and seeks proprietary and confidential business information. Specifically, the information sought by this interrogatory is beyond the scope of the definition of transport as redefined by the TRO. The FCC expressly rejected adoption of an impairment test based on each link between two incumbent local exchange carrier offices (so called "daisy chaining") at paragraph 402 of the TRO.

25. For each arrangement identified in response to Interrogatory 24 and in response to Interrogatory 16, please list the types of services that are provided utilizing such an arrangement.

- a. List all types of services you offer to your end users from each collocation space describe or demand and the quantity of each service you provide and/or offer.
- b. For each service identified in (a), list the average monthly revenue associated with each type of service.

RESPONSE:

ITC^DeltaCom objects on the grounds stated in the objection to interrogatory 24.

26. Provide a list of all customer locations in each/any of the Southeastern states at which you have deployed high capacity loop facilities (DS3 or greater facilities, including dark fiber) that you own and where you are serving customers using those facilities. This interrogatory varies from Interrogatory No. 8 in this docket as it is not limited to loop facilities solely used to provide retail service. For each customer location, identify:

- a. The RSAG valid address of the customer location;
- b. The CLLI code of the CLEC switch, wire center, collocation, point of interconnection, etc. from which the loop is extended to the customer location (by 11 character CLLI);
- c. Whether you have the unrestricted ability to serve all customers at that location, if the location is a multi-tenant location. If not, explain with particularity why not, including any restrictions on your ability to serve customers and the steps you have taken to address such restrictions.
- d. The total active capacity and the number of fiber strands on your facilities at the specific customer locations using the most recent data available;
- e. Whether your facilities are operationally ready to provide DS3 loops at the specific customer location.

RESPONSE:

ITC^DeltaCom objects to on the grounds that the information requested is irrelevant, not reasonably calculated to lead to discovery of admissible evidence, is unduly burdensome, and seeks proprietary and confidential business information. The information sought goes beyond the FCC's definition of a loop which is the transmission facility between an incumbent LEC central office and an end user's premises.

27. Describe with particularity all factors you consider when deciding whether to extend high capacity loop or transport facilities to:

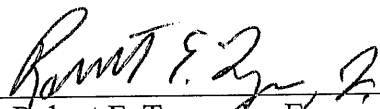
- a. pick up additional traffic;
- b. pick up additional or new customers;
- c. pick up additional or new buildings.

RESPONSE:

ITC^DeltaCom objects to on the grounds that the information requested is irrelevant, not reasonably calculated to lead to discovery of admissible evidence, is unduly burdensome, and seeks proprietary and confidential business information.

SOWELL GRAY STEPP & LAFFITTE, L.L.C.

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December 18, 2003

CERTIFICATE OF SERVICE

I, the undersigned of the law offices of Sowell Gray Stepp & Laffitte, L.L.C., attorneys for ITC^DeltaCom Communications, Inc., do hereby certify that I have a copy of the pleading(s) hereinbelow specified via e-mail to the following address(es):

Pleadings: **ITC^DeltaCom Communications, Inc.'s Objections to BellSouth Telecommunications, Inc.'s First Set of Interrogatories (14-27)**

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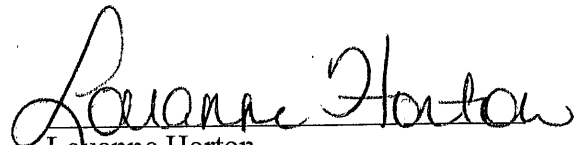
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